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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:13-cr-00253-JAD-PAL
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	REVOCATION HEARING
)	Consolidated with Case:
DANIEL J. DEASE,)	2:15-cr-00255-JAD-PAL
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, DANIEL J. DEASE, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, SUSAN CUSHMAN, Assistant U.S. Attorney, that the Trial in the above-captioned matter currently set for Tuesday, June 28, 2016 be re-set for at least 30 days or a time convenient for the court.

This Stipulation is entered into for the following reasons

1. On December 23, 2015 the case 2:13-cr-00253 was consolidated and assigned to the Honorable Judge Jennifer A. Dorsey with current case number 2:15-cv-00255.
2. Mr. Leventhal needs additional time to review a proposed Plea Agreement in the case that this instant matter was consolidated with.
3. Counsel is requesting the continuance of this matter to be reset and coordinated with case #2:15-cr-00255-JAD-PAL

4. Mr. Dease is currently in custody and agrees with this request.

5. Mr. Leventhal has spoken to SUSAN CUSHMAN, Assistant United States Attorney, and she has no objection to this continuance.

6. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

DATED this 8th day of June, 2016.

/s/ Todd M. Leventhal
TODD M. LEVENTHAL, ESQ.
Counsel for Daniel J. Dease

/s/ Susan Cushman
 SUSAN CUSHMAN
 Assistant U.S. Attorney

Submitted By: LEVENTHAL & ASSOCIATES, PLLC

By: /s/ Todd M. Leventhal

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UNITED STATES DISTRICT COURT
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UNITED STATES OF AMERICA,)	
)	2:15-cr-00255-JAD-PAL
Plaintiff,)	
)	
vs.)	
)	
DANIEL J. DEASE,)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. On December 23, 2015 the case 2:13-cr-00253 was consolidated and assigned to the Honorable Judge Jennifer A. Dorsey with current case number 2:15-cv-00255.
2. Mr. Leventhal needs additional time to review a proposed Plea Agreement in the case that this instant matter was consolidated with.
3. Counsel is requesting the continuance of this matter to be reset and coordinated with case #2:15-cr-00255-JAD-PAL
4. Mr. Dease is currently in custody and agrees with this request.
5. Mr. Leventhal has spoken to SUSAN CUSHMAN, Assistant United States Attorney, and she has no objection to this continuance.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2016 a true and correct copy of the,

STIPULATION AND ORDER TO CONTINUE REVOCATION HEARING

was filed through the CM/ECF filing system and was electronically served to the following registered addresses on file for this instant case :

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/s/ Carmen Martinez
An Employee of TODD M. LEVENTHAL, ESQ.
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